From: Heather McDivitt
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209–AA50)
Date: Thursday, June 16, 2022 8:16:35 PM

To Whom it May Concern,
I am a professor of Ethics at St Bonaventure University. I STRONGLY oppose OGE's proposed legal expense fund regulation as drafted. To root out problems the OGE should:

- remove the exception that makes compliance with the regulation optional; ETHICS SHOULD NOT BE OPTIONAL FOR ANYONE
- replace the proposed recusal requirement with a broader 5-year recusal requirement that prevents donors of cash gifts from influencing decisions, policies, or regulations affecting them or the industries in which they have substantial interests;
- remove the offensive example involving an accused sexual harasser; and
- place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

These are important changes to include in the proposed regulation. We need to hold office holders accountable and we need STRONG ethics rules.
Thank you,
Heather McDivitt